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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

LYNN GRIMSTAD, an individual, and
on behalf of all others similarly situated,
and MARA MANUEL, an individual,
and on behalf of all others similarly
situated,

Plaintiffs,

-vs-

FCA US, LLC, a Michigan Limited
Liability Company; and DOES 1 through
300,000 inclusive,

Defendant.

Case No.: 8:16-cv-00763-JVS-E

**EXHIBITS IN SUPPORT OF
MOTION FOR CLASS
CERTIFICATION**

Honorable Judge James V. Selna
Courtroom: 10C

Date: February 6, 2017
Time: 1:30pm

EXHIBIT 1



CHRYSLER

June 6, 2013

Ms. Nancy Lummen Lewis
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Recall Management Division (NVS-215)
Room: W48-302
1200 New Jersey Ave. SE
Washington, DC 20590

Dear Ms. Lewis:

Attached is Chrysler Group LLC's ("Chrysler") *updated* Defect Information Report, complying with the requirements of 49 CFR Part 573, Defect and Noncompliance Reports, which contains details of a potential safety related defect in vehicles. *The update includes information relating to clarification of incidents and customer claims identified during this investigation. The change is in Section 573.6(c)(6).*

Chrysler Group will conduct a voluntary safety recall to reflash the final drive controller on all affected vehicles with updated control software.

Sincerely,

Kristin J. Kolodge

Enclosure: Defect Information Report for Chrysler Group LLC. Recall N23

cc: Frank Borris, NHTSA

DEFECT INFORMATION REPORT FOR CHRYSLER GROUP LLC

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Submission Date: May 7, 2013; Revised June 6, 2013

573.6(c)(1): Manufacturer's Name, Brand Name

Chrysler Group LLC, Jeep

573.6(c)(2): Identification of Affected Vehicles

Make(s)	Model(s)	Model Year(s)	Inclusive Dates of Manufacture
Jeep	Grand Cherokee	2005 to 2010	February 11, 2004 to March 9, 2010
Jeep	Commander	2006 to 2010	January 31, 2005 to March 10, 2010

573.6(c)(2)(iv): Component manufacturer name, address, telephone number, and country of origin:

Tier 1:

Magna Powertrain
1870 Technology Dr,
Troy, MI USA
(248) 680-4900

Subcomponent supplier:

Preh de Mexico S.A. de C.V.GmbH
Crio 814
Guadalupe, Nuevo Leon, Mexico
52 81 5102 5700

573.6(c)(3): Potentially Affected Vehicle Population

295,345 (estimated)

573.6(c)(4): Percentage of Affected Vehicles

Unknown

573.6(c)(5): Description of Defect or Noncompliance

Some vehicles may experience a transfer case actuator encoder electrical failure that results in unintentional transfer case shifting into or through the neutral position, which may result in vehicle rollaway and may result in a crash.

DEFECT INFORMATION REPORT FOR CHRYSLER GROUP LLC

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573.6(c)(6): Chronology of Principal Events Leading to Determination of a Safety Defect

- On January 18, 2012, Chrysler opened an investigation as result of a customer complaining of his 2007 MY Grand Cherokee shifting to neutral and rolling upon a remote start.
- The 245 transfer case is an automatic 4WD system that shifts into and out of 4WD modes and ranges automatically or based on customer inputs. The shifting is accomplished with an electric actuator (composed of a motor, gearing, and electric position encoder) and is commanded by the final drive control module.
- On January 30, 2012 engineering requested additional actuators be collected through the warranty system. Engineering engaged the transfer case supplier to analyze the actuators returned under warranty.
- The warranty analysis was completed on October 11, 2012 and found cracks in the actuator circuit board traces that resulted in a biased (offset) position signal which could be incorrectly interpreted by the final drive controller.
- During the initial vehicle startup sequence, the controller can automatically command a transfer case shift, without input from the driver (attempting to correct its position based on a biased signal).
- On September 25, 2012 Chrysler obtained the software source code from the controller supplier and began to review the code for possible changes.
- On December 3, 2012, Chrysler completed software modifications to prevent unintended shifting due to a biased encoder signal. On March 19, 2013 Chrysler completed validation of the new software.
- *During its investigation, Chrysler identified 34 CAIRs, 1 field report, and 1 VOQ reported between April 3, 2006 and May 25, 2012 potentially related the transfer case actuator.*
- *Chrysler Group LLC is aware of 26 accidents and 2 injuries between July 26, 2006 and January 31, 2012 that could be related to this issue.*
- On April 30, 2013, Chrysler Group LLC decided to conduct a voluntary safety recall to reflash the final drive controller on all affected vehicles.

573.6(c)(7): Information Used in Determination of a Noncompliance

N/A

DEFECT INFORMATION REPORT FOR CHRYSLER GROUP LLC

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573.6(c)(8): Description of Remedy

Chrysler will conduct a voluntary safety recall to reflash the final drive controller with new software that can recognize a biased signal and set a fault.

Chrysler has a longstanding policy and practice of reimbursing owners who have incurred the cost of repairing a problem that subsequently becomes the subject of a field action. To ensure consistency, Chrysler, as part of the owner letter, will request that customers send the original receipt and/or other adequate proof of payment to the company for confirmation of the expense.

573.6(c)(10): Dealer and Owner Communications

Chrysler plans to begin notification of dealers and owners in June, 2013. Chrysler will provide the dealer and owner letters when available.

573.6(c)(11): Manufacturer's Campaign Number

Chrysler has assigned recall number N23 to this action.

EXHIBIT 2

Recall Quarterly Report

8 of 8

13V-175

Manufacturer Name : Chrysler Group LLC
NHTSA Recall No. / MFR Recall No. : 13V-175 /N23
Recall Subject : Possible Vehicle Rollaway
Owner Notification Date : -



Report #	Submission Date	Report Quarter	Recall Population	Total Remedied	Total Unreachable	Total Removed
5	OCT 09, 2014	2014-3	295,345	196,022	15,406	172
4		2014-2	295,246	182,469	16,098	172
3		2014-1	295,246	155,709	17,069	173
2		2013-4	295,246	126,850	0	173
1		2013-3	295,246	83,241	1	175

This Document Last Updated : DEC 13, 2014

Definitions :

Report Quarter : The quarter the manufacturer is reporting recall completion figures (e.g. 2012-3 means the 3rd quarter of 2012).

Recall Population : The total number of products recalled by the manufacturer.

Total Remedied : The total number of products either remedied, inspected without needing remedy, or returned to inventory.

Total Unreachable : Products deemed unreachable as owner notifications were unable to be delivered.

Total Removed : Products that have been scrapped, stolen, or exported.